

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JEFFREY M. BOWER,

Plaintiff,

v.

NATIONAL ADMINISTRATIVE
SERVICE CO., LLC and
AFFORDABLE AUTO
PROTECTION, LLC,

Defendants.

CIVIL NO. 4:21-cv-00998-MWB

ORDER

AND NOW, this ____ day of _____, 2021, upon consideration of the Motion of Defendants, National Administrative Service Co., LLC and Affordable Auto Protection, LLC, to Dismiss Plaintiff, Jeffrey M. Bower's Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), it is hereby

ORDERED

that the Motion is **GRANTED** and that the Complaint is **DISMISSED** with prejudice.

BY THE COURT:

MATTHEW W. BRANN, J.

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**MOTION OF DEFENDANTS, NATIONAL ADMINISTRATIVE SERVICE
CO., LLC AND AFFORDABLE AUTO PROTECTION, LLC, TO
DISMISS PLAINTIFF, JEFFREY M. BOWER'S
COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6)**

Defendants, National Administrative Service Co., LLC and Affordable Auto Protection, LLC, through their attorneys, O'Hagan Meyer, PLLC, hereby moves this Honorable Court to dismiss the Plaintiff's Complaint pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted for the reasons set forth in the accompanying Memorandum of Law, which is incorporated herein by reference.

Respectfully Submitted,

O'HAGAN MEYER, PLLC

BY: /s/Christopher C. Negrete

JOHN P. MORGENSTERN

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Attorneys for Defendants,

National Administrative Service Co., LLC

and Affordable Auto Protection, LLC

Dated: June 7, 2021

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JEFFREY M. BOWER,

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CERTIFICATE OF NON-CONCURRENCE

I, Christopher C. Negrete, Esquire, hereby certify that I contacted Jeremy C. Jackson, Esquire, counsel for Plaintiff, Jeffrey M. Bower, to inquire whether Plaintiff concurred with the Motion to Dismiss of Defendants, National Administrative Service Co., LLC and Affordable Auto Protection, LLC. While the undersigned has not yet heard back from Mr. Jackson, due to the nature of the Motion at issue, it is presumed that Plaintiff does not concur in the Motion.

O'HAGAN MEYER, PLLC

BY: /s/Christopher C. Negrete
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*Attorneys for Defendants,
National Administrative Service Co., LLC
and Affordable Auto Protection, LLC*

Dated: June 7, 2021

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CERTIFICATE OF SERVICE

I, Christopher C. Negrete, hereby certify that on the date set forth below, I did cause a true and correct copy of the foregoing Motion to Dismiss to be filed with the Court's ECF/PACER Electronic filing system, where it was available for immediate viewing and download by all counsel of record.

/s/ Christopher C. Negrete

Christopher C. Negrete

Date: June 7, 2021